

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION**

UNITED STATES OF AMERICA,)	
)	
vs.)	No. 1:24-cr-00027-MOC-WCM-1
)	
JENNIFER FOX,)	
<i>Defendant.</i>)	

UNOPPOSED MOTION TO CONTINUE

Comes now Defendant and would respectfully show the Court as follows:

1. This case is currently set for docket call on June 3, 2024.
2. Ms. Fox is on pre-trial release, in part because she has serious medical conditions that require surgery. Her previous surgery date was interrupted due to her temporary detention following her arrest on these charges. She will receive her new surgery date following a visit to a provider later this week. She expects that the surgery will take place at the end of the month and will require time to recuperate. As such, counsel anticipates that she will be physically unable to meaningfully prepare for and participate in a trial in the current term.
3. Due to technical issues with the discovery production, undersigned counsel only recently received a useable copy of the initial discovery production, which is voluminous. Additionally, the Government has advised that it is sending another production this week, consisting primarily of electronic data.

4. Undersigned counsel requires additional time to review the existing and new discovery, determine whether pre-trial motions are appropriate, develop an appropriate strategy, and explore non-trial options.

5. Undersigned counsel requests that docket call and the pre-trial motions deadline be continued until the next term of Court.

6. Undersigned counsel has conferred with Ms. Fox about her constitutional and statutory speedy trial rights and, after being duly informed, consented to the filing of the instant motion.

7. The assigned AUSA advises that the Government does NOT object.

Dated: May 15, 2024

Respectfully submitted,

JENNIFER FOX

s/Howard W. Anderson III
Howard W. Anderson III
N.C. Bar #50561

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CERTIFICATE OF SERVICE

I, Howard W. Anderson III, certify that I filed a copy of the foregoing paper using

the Court's CM/ECF system, which will deliver a copy to all counsel of record except for the following, whom I have this day served by U.S. Mail:

n/a – via CM/ECF

s/Howard W. Anderson III
Howard W. Anderson III
N.C. Bar #50561